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February 17, 1992

Dave Roderick
Bloomfield Refining Co.
PO Box 159
Bloomfield, NM 87413

BLMF

Dear Mr. Roderick,

This is in response to correspondence from Bloomfield Refining Co. requesting a determination on the permitting status of a tank treatment system you propose to put in operation to replace the surface impoundments you currently use to remove benzene and other organic constituents from one of your waste streams (letters dated December 10, 1991 and January 7, 1992).

After reviewing the materials enclosed with your correspondence, and discussing this issue with EPA Region VI personnel, we have determined that the tank treatment system you describe would be permissible under 40 CFR section 264 subpart X (Miscellaneous Units). The unit you describe does not meet the accumulation tank exemption requirements because it is not an accumulation tank: the waste stream flows through the tank on a continuous basis.

If you have other information you wish to present regarding your tank treatment system, please do so as soon as possible. We are in receipt of the Part B application on the surface impoundments and will begin administrative review of this application within the next 30 days. Once the Part B is determined to be administratively complete, you will be assessed a permit fee. Therefore, it is imperative that a final decision be made on your part as to how we should proceed with this application.

If you have any questions or wish to schedule a meeting, please call me or Dr. Herb Grover of my staff at 827-4300 at your earliest convenience.

Sincerely,

Edward L. Horst
RCRA Program Manager
Hazardous and Radioactive Materials Bureau